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6 **UNITED STATES DISTRICT COURT**
 7 **DISTRICT OF NEVADA**

8	BMF WALLETS, LLC,)	Case 2:21-cv-02181-RFB-DJA
9)	
	Plaintiff,)	
10	v.)	STIPULATED MOTION AND
)	[PROPOSED] ORDER FOR
11	MIRAMAX, LLC,)	EXTENSION OF TIME TO ANSWER
)	OR OTHERWISE RESPOND TO THE
12	Defendant.)	COMPLAINT
13)	(Third Request)

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 15 Pursuant to Federal Rule of Civil Procedure 6(b)(1), LR 7-1(c), and LR IA 6-1, Plaintiff
 16 BMF Wallets, LLC and Defendant Miramax, LLC, hereby move this Court for a 14-day extension
 17 of time for Defendant to file and serve its answer or otherwise respond to the Complaint (ECF No.
 18 1). This is the third request by the parties for such an extension.

19 Defendants were served with Plaintiff's Complaint on December 15, 2021. On December
 20 21, 2021, the parties submitted a stipulated Motion for a 30-day extension of time for Defendant
 21 to response to the Complaint (ECF No. 6), which the Court granted on December 22, 2021 (ECF
 22 No. 7), setting a February 4, 2022, deadline for Defendant to answer or otherwise respond to the
 23 Complaint. On January 26, 2022, the parties submitted a second stipulated Motion for a 14-day
 24 extension of time for Defendant to response to the Complaint (ECF No. 8), which the Court granted
 25 on January 27, 2022 (ECF No. 8), setting a February 18, 2022, deadline for Defendant to answer
 26 or otherwise respond to the Complaint.

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1 The parties have been engaged in ongoing discussions regarding the terms and conditions
2 of a settlement, which discussions have been delayed in part due to the holidays and the
3 unavailability of certain persons employed by Defendant involved in the negotiations. An initial
4 proposal was communicated by Defendant on December 27, 2021. Plaintiff responded to such
5 proposal with its own counterproposal on January 5, 2022. On January 25, 2022, Plaintiff, through
6 counsel, communicated terms and conditions of another settlement proposal. On February 7, 2022,
7 Defendant, through counsel, responded to Plaintiff's settlement proposal by setting forth those areas
8 where the parties were in accord and counterproposals for those terms and conditions that were
9 not acceptable to Defendant. On February 16, 2022, Plaintiff, through counsel, responded to
10 Defendant's last counterproposal by preparing a draft settlement agreement for Defendant's
11 review.

12 In order to give the parties additional time to try and work out a settlement prior to moving
13 forward with the case, the parties have agreed to give Defendant an additional 14-day extension of
14 time to answer or otherwise respond to the Plaintiff's Complaint. For these reasons, this extension
15 request is made for good cause and not for purposes of delay.

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1 For the foregoing reasons, the parties hereby stipulate and agree to extend the deadline for
2 Defendant to answer or otherwise respond to the Complaint from February 18, 2022, to March 4,
3 2022.

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5 Dated: February 17, 2022

6 Respectfully Submitted,

7 **GILE LAW GROUP, LTD.**

8 /s/ Ryan Gile

9 Ryan Gile, Esq.

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14 Tel. (702) 703-7288

15 *Attorney for Plaintiff BMF Wallets, LLC*

16 **IT IS SO ORDERED:**

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UNITED STATES MAGISTRATE JUDGE

DATED: February 18, 2022

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2022, I served a full, true and correct copy of the foregoing **STIPULATED MOTION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT** via email on the following parties:

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/s/ Ryan Gile
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